

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MARIELA DELGADO PEREZ

DEBTOR

CASE NO 15-04096-BKT

CHAPTER 13

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN
AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

NOW COMES, MARIELA DELGADO PEREZ, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays:

1. The debtor is hereby submitting a proposed amended Plan, dated August 11, 2015, herewith and attached to this motion.

2. This proposed amended Plan is filed to include step-up payment in Plan (since car loan paid by the debtor matures within the life of the Plan) and to provide that any excess over \$1,200.00 from debtor's Christmas Bonus will be devoted to fund the Plan, in order to cure the objections raised by the Trustee in his unfavorable recommendation, docket #16.

WHEREFORE debtor respectfully requests the confirmation of the requested amended Plan, dated August 11, 2015.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtor in the above captioned case, and to all creditors and parties in interest appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 11th day of August, 2015.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL. NO. (787) 744-7699

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. 3:15-bk-4096

DELGADO PEREZ, MARIELA

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____		<input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>8/11/2015</u>	
<input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
I. PAYMENT PLAN SCHEDULE		II. DISBURSEMENT SCHEDULE	
$\$ \underline{150.00} \times \underline{38} = \$ \underline{5,700.00}$		A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____	
$\$ \underline{400.00} \times \underline{22} = \$ \underline{8,800.00}$		B. SECURED CLAIMS:	
$\$ \underline{\hspace{1cm}} \times \underline{\hspace{1cm}} = \$ \underline{\hspace{1cm}}$		<input type="checkbox"/> Debtor represents no secured claims.	
$\$ \underline{\hspace{1cm}} \times \underline{\hspace{1cm}} = \$ \underline{\hspace{1cm}}$		<input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:	
$\$ \underline{\hspace{1cm}} \times \underline{\hspace{1cm}} = \$ \underline{\hspace{1cm}}$		1. <input type="checkbox"/> Trustee pays secured ARREARS:	
TOTAL: \$ <u>14,500.00</u>		Cr. _____ Cr. _____ Cr. _____	
Additional Payments:		# _____ # _____ # _____	
\$ _____ to be paid as a LUMP SUM		\$ _____ \$ _____ \$ _____	
within _____ with proceeds to come from:		2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims:	
<input type="checkbox"/> Sale of Property identified as follows:		Cr. _____ Cr. _____ Cr. _____	
_____		# _____ # _____ # _____	
<input type="checkbox"/> Other:		\$ _____ \$ _____ \$ _____	
_____		3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL:	
Periodic Payments to be made other than, and in		Cr. _____ Cr. _____ Cr. _____	
addition to the above:		# _____ # _____ # _____	
\$ _____ x _____ = \$ _____		\$ _____ \$ _____ \$ _____	
PROPOSED BASE: \$ <u>14,500.00</u>		4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:	
III. ATTORNEY'S FEES		5. <input type="checkbox"/> Other:	
(Treated as § 507 Priorities)		6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to:	
Outstanding balance as per Rule 2016(b) Fee		ADM. SISTEMA RETI	
Disclosure Statement: \$ <u>2,893.00</u>		C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.	
Signed: <u>/s/ MARIELA DELGADO PEREZ</u>		11 U.S.C. § 507 and § 1322(a)(2)	
Debtor		D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.	
Joint Debtor		1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____	
		<input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____	
		Cr. _____ Cr. _____ Cr. _____	
		# _____ # _____ # _____	
		\$ _____ \$ _____ \$ _____	
		2. Unsecured Claims otherwise receive PRO-RATA disbursements.	
		OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)	
		* "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."	
		* Current mortgage loan payments to Adm Sistemas de Retiro are being made directly thorough payroll deductions, by debtor's spouse/separated Julio N Reynoso Concepcion Bk Case no. 14-02259 ESI13 USBC-DPR.	
		* "Any excess over \$1,200.00 from debtor's Christmas Bonus will be devoted each year to the plan's funding until completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor shall seek court's authorization prior any use of funds".	

Attorney for Debtor R. Figueroa Carrasquillo Law Office

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AMENDED CHAPTER 13 PAYMENT PLAN

Label Matrix for local noticing
0104-3
Case 15-04096-BKT13
District of Puerto Rico
Old San Juan
Tue Aug 11 15:53:39 AST 2015

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End of Label Matrix	
Mailable recipients	25
Bypassed recipients	0
Total	25